

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DARKPULSE, INC.,

Plaintiff,

v.

FIRSTFIRE GLOBAL OPPORTUNITIES
FUND, LLC, and ELI FIREMAN,

Defendants.

CIVIL ACTION NO. 22-cv-22111

**[PROPOSED] ORDER GRANTING
A PRELIMINARY INJUNCTION**

Upon consideration of the Declaration of Dennis O’Leary, Dated January 14, 2022; the Emergency Supplemental Declaration of Dennis O’Leary dated January 17, 2022 and Exhibits attached thereto; Plaintiff’s motion for Preliminary Injunction, and accompanying memorandum of law, it is hereby

ORDERED, that Plaintiff DarkPulse, Inc. is granted a preliminary injunction pursuant to Fed. R. Civ. P. Rule 65, enjoining, during the pendency of this action, Defendants and their agents, servants, employees, attorneys, and affiliates, from selling, transferring, assigning, encumbering, or otherwise disposing of any DarkPulse shares of common stock, or proceeds derived from a sale of Darkpulse’s common stock, currently in their possession or control; and it is further

ORDERED, that a constructive trust is imposed on the stock obtained by the Defendants through their conversion of debt on November 15, 2021, as referenced in the January 14, 2022, Declaration by Dennis O’Leary or, if any of Darkpulse’s stock has been sold, a constructive trust is also imposed on the proceeds acquired from the sale of Darkpulse’s stock; and it is further

ORDERED, that Plaintiff post a bond in the amount of \$100,000 by _____.

Dated: _____, 2022
New York, New York.

SO ORDERED.

United States District Judge